

1 Magistrate Judge Mary Alice Theiler
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10 UNITED STATES DISTRICT COURT FOR THE
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE
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15 UNITED STATES OF AMERICA,

16 NO. MJ18-288

Plaintiff,

v.

DISCOVERY PROTECTIVE ORDER

17 CHRISTOPHER LEE WOOD,

Defendant.

18 This matter, having come to the Court's attention on the Stipulation for Entry of a
19 Discovery Protective Order submitted by the United States of America and Defendant
20 Christopher Lee Wood, and the Court, having considered the motion, and being fully
advised in this matter, hereby enters the following PROTECTIVE ORDER:

21 1. Protected Material

22 The following documents and materials are deemed Protected Material. The
23 United States will make available copies of the Protected Materials, including those filed
24 under seal, to defense counsel to comply with the government's discovery obligations.
25 Possession of copies of the Protected Materials is limited to the attorneys of record, and
26 investigators, paralegals, law clerks, experts, and assistants for the attorneys of record
27 (hereinafter collectively referred to as members of the defense team). This category of
28 Protected Materials will be marked and labeled as "Protected Material":

1 a. Grand Jury transcripts and exhibits.
 2 b. Victim/Witness statements, including but not limited to reports of
 3 law enforcement officers memorializing witness/victim statements, audio/video
 4 recordings of interviews of victims and witnesses, and anti-harassment or protection
 5 order hearings and applications.

6 c. Records, reports, and documents related to medical visits and
 7 examinations, children's advocacy centers and agencies, Child Protective Services, and
 8 schools.

9 d. The personal information related to victim/witnesses, and any
 10 statements and documents containing personal information about or related to any
 11 victims and witnesses provided by the government in discovery is deemed Protected
 12 Material. As used in this Order, the term "personal information" refers to each victim
 13 and witness's full name, date of birth, Social Security number (or other identification
 14 information), driver's license number, address, telephone number, location of residence
 15 or employment, school records, juvenile criminal records, and other confidential
 16 information.

17 2. Scope of Review of Protected Material

18 Defense attorneys of record and members of the defense team may display and
 19 review the Protected Material with the Defendant. The attorneys of record and members
 20 of the defense team acknowledge that providing copies of the Protected Material to the
 21 Defendant and other persons is prohibited, and agree not to duplicate or provide copies of
 22 Protected Material to the Defendant and other persons.

23 3. Consent to Terms of Protective Order

24 Members of the defense team shall provide written consent and acknowledgement
 25 that they will each be bound by the terms and conditions of this Protective Order. The
 26 written consent need not be disclosed or produced to the United States unless requested
 27 by the Assistant United States Attorney and ordered by the Court.

1 4. Parties' Reciprocal Discovery Obligations

2 Nothing in this order should be construed as imposing any discovery obligations
3 on the government or the defendant that are different from those imposed by case law and
4 Rule 16 of the Federal Rules of Criminal Procedure, and the Local Criminal Rules.

5 5. Filing of Protected Material

6 Any Protected Material that is filed with the Court in connection with pre-trial
7 motions, trial, sentencing, or other matter before this Court, shall be filed under seal and
8 shall remain sealed until otherwise ordered by this Court. This does not entitle either
9 party to seal their filings as a matter of course. The parties are required to comply in all
10 respects to the relevant local and federal rules of criminal procedure pertaining to the
11 sealing of court documents.

12 6. Non-termination

13 The provisions of this Order shall not terminate at the conclusion of this
14 prosecution.

15 7. Violation of Protective Order

16 Any violation of any term or condition of this Order by the Defendants, their
17 attorney(s) of record, or any member of the defense team may be held in contempt of
18 court, and/or may be subject to monetary or other sanctions as deemed appropriate by this
19 Court.

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If a Defendant violates any term or condition of this Order, the United States reserves its right to seek a sentencing enhancement for obstruction of justice, or to file any criminal charges relating to any Defendant's violation.

DATED this 27 day of July, 2018.

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MARY ALICE THEILER
United States Magistrate Judge

Presented by:

/s/ Cecelia Y. Gregson
CECELIA Y. GREGSON

/s/ Nancy Tenney
NANCY TENNEY